

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WALKER DIGITAL, LLC,

Plaintiff,

v.

CAPCOM ENTERTAINMENT, INC., CAPCOM
U.S.A., INC., ELECTRONIC ARTS, INC.,
KONAMI DIGITAL ENTERTAINMENT, INC.,
MICROSOFT CORPORATION, SEGA OF
AMERICA, INC., SONY COMPUTER
ENTERTAINMENT AMERICA LLC, SQUARE
ENIX OF AMERICA HOLDINGS, INC., SQUARE
ENIX, INC., THQ INC., and UBISOFT, INC.,

Defendants.

C. A. No. 11-368-GMS

**PLAINTIFF WALKER DIGITAL, LLC'S ANSWER TO
DEFENDANT MICROSOFT CORPORATION'S COUNTERCLAIMS**

Plaintiff Walker Digital, LLC ("Walker Digital"), by and through its undersigned counsel, as and for its Answer to the Counterclaims of Defendant Microsoft Corporation ("Microsoft") (D.I. 25), states as follows:

THE PARTIES

153. Walker Digital lacks knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph 153 of the Counterclaims.

154. Admitted that Walker Digital is a limited liability company with its principal place of business at 2 High Ridge Park, Stamford, Connecticut 06905.

JURISDICTION AND VENUE

155. Admitted.

156. Admitted.

157. Admitted.

COUNT I

Declaratory Judgment of Non-Infringement of the '486 Patent

158. Walker Digital incorporates its response to paragraphs 153-157 of Microsoft's Counterclaims as if fully set forth herein.

159. Admitted.

160. Admitted, except Walker Digital denies that Microsoft has any rights regarding the '486 Patent.

161. Denied.

COUNT II

Declaratory Judgment of Invalidity and/or Unenforceability of the '486 Patent

162. Walker Digital incorporates its response to paragraphs 153-161 of Microsoft's Counterclaims as if fully set forth herein.

163. Denied.

164. Denied.

EXCEPTIONAL CASE

165. Denied.

PRAYER FOR RELIEF

WHEREFORE, Walker Digital demands the following relief:

- (A) Judgment in favor of Walker Digital;
- (B) Judgment dismissing Microsoft's Counterclaims with prejudice;
- (C) Such other and further relief as the Court deems just and equitable.

August 4, 2011

BAYARD, P.A.

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